

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **DAVID E. FURRY**, aka : Chapter **13**  
David Edward Furry, : Case No. **5:20-bk-01098**  
Debtor(s), :  
  
**PENNYMAC LOAN SERVICES, LLC**, :  
Movant, : **Motion for**  
v. : **Relief from Stay**  
**DAVID E. FURRY** and :  
Charles J. DeHart, III, Chapter 13 Trustee, :  
Respondent, :

**ANSWER TO MOTION OF  
PENNYMAC FOR RELIEF FROM STAY**

AND NOW COMES Debtor(s) **DAVID E. FURRY**, by and through their attorneys, **FISHER CHRISTMAN**, and in Answer to the Motion of **PENNYMAC LOAN SERVICES, LLC**, for Relief from Stay aver:

- 1-2. Admitted.
3. Denied. Upon information and belief, the Trustee was selected by the Office of the United States Trustee.
4. Denied to the extent the averments of paragraph 4 constitute other than a statement or conclusion of law or misplaced request for relief.
5. Admitted.
6. Denied. Debtor last reported to Counsel for Debtor that two payments of \$1,077 were sent to Movant that are not credited on the payment history filed as an Exhibit with the Motion. One was made in late December of 2020, and the other was made in early January of 2021. Counsel for Debtor has been unable to communicate with Debtor since February 12, 2021. On that date Debtor 1) indicated he was subject to quarantine for COVID-19 exposure and 2) proof of payment for at least those two uncredited payments would be provided.
7. Denied. See response to paragraph 6, above.

8. Denied to the extent the averments of paragraph 8 constitute other than a statement or conclusion of law or misplaced request for relief.

9. Denied to the extent the averments of paragraph 9 constitute other than a statement or conclusion of law or misplaced request for relief.

WHEREFORE, Debtor **DAVID E. FURRY** respectfully prays this Honorable Court for an Order than the Motion of **PENNYMAC LOAN SERVICES, LLC**, for Relief from Stay be Denied, and for such other and further relief as the Honorable Court deems just and appropriate.

Respectfully Submitted,

/s/ J. Zac Christman  
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